

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

GREG ABBOTT, in his capacity as  
GOVERNOR OF THE STATE OF TEXAS,  
and THE STATE OF TEXAS,

*Defendants.*

Case No. 1:23-cv-00853-DAE

**PROPOSED ORDER**

Upon consideration of the United States' Opposed Motion for Protective Order ("Motion") and opposition filed thereto, and on good cause having been shown, it is on this \_\_\_\_ day of \_\_\_\_\_ 2024 hereby:

ORDERED that the United States' Motion is GRANTED; and it is further

ORDERED that the topics below from Defendants' Amended 30(b)(6) Notices are quashed in their entirety:

- 1) U.S. Section of the International Boundary & Water Commission Amended Notice Topics: 1, 2, 6-10, 12, 13, 16-18, 20-23, 25-27, 29, 30-37, 46-48;
- 2) The United States Coast Guard Amended Notice Topics: 2, 6-12, 14, 15, 25, 26, 28, 29;
- 3) The United States Customs and Border Protection Amended Notice Topics: 1-12, 15, 16, 20-22, 25;
- 4) The United States Army Corps of Engineers Amended Notice Topics: 17-20, 27-31, 33-35, 37-40, 43, 45, 55, 56; and it is further

ORDERED that USIBWC Amended Topics 14 & 50 (duplicates) are quashed as to “feasibility and reasonableness” and that CBP Amended Topic 24 is quashed as to “illegal people, guns, drugs”; and it is further

ORDERED that each 30(b)(6) deposition is limited to the remaining topics contained in Defendants’ respective amended 30(b)(6) notices consistent with this Order; and it is further

ORDERED that each 30(b)(6) deposition shall not exceed seven hours of testimony regardless of the number of designees; and it is further

ORDERED that Defendants are limited to the presumptive number under the Federal Rules of ten total depositions of the following: the four expert witness depositions that have already occurred, the four 30(b)(6) depositions on the topics prescribed by this Order, the City of Eagle Pass Texas, and Hillary Quam.

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The Honorable David A. Ezra  
United States District Judge